

IDAHO FRESH PAK PLANT 1 OFFICE AND PACKAGING (PWS 7260067) SOURCE WATER ASSESSMENT FINAL REPORT

January 15, 2002



State of Idaho Department of Environmental Quality

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Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the Act. This assessment is based on a land use inventory of the designated source water assessment area and sensitivity factors associated with the well and aquifer characteristics.

This report describes the public drinking water for *Idaho Fresh Pak Plant 1 Office and Packaging in Lewisville, Idaho*, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The Idaho Fresh Pak Plant 1 drinking water system consists of one well source. The well has a high susceptibility rating to inorganic, synthetic organic and microbial contamination, and a moderate susceptibility rating to volatile organic contaminants. The high ratings can be attributed to the presence of a dairy, a couple of wastewater land application (WLAP) sites, and a major transportation corridor as well as the predominant agricultural land use contributing inorganic, synthetic organic and microbial constituents to the delineation of the well.

There are no current significant potential water problems affecting Idaho Fresh Pak Plant 1 water system. The well recorded a total coliform bacteria detection in the distribution system in October 2000, with no other total coliform bacteria detections since. The well has not recorded the presence of volatile organic or synthetic organic contamination during any water chemistry tests. The inorganic contaminants (IOCs) barium, chromium and fluoride have been detected at levels under the maximum contaminant level (MCL). Nitrate concentrations have been recorded at levels below 1.6 mg/L. The Maximum Contaminant Level for nitrate is 10 mg/L. Surrounding agricultural land use practices have contributed to the ratings of “High” for county level nitrogen fertilizer use, county level herbicide use, and total county level Ag-chemical use.

The Idaho Fresh Pak Plant 1 well presently does not have a disinfection system in place. Though there have not been chemical problems with the system water, Idaho Fresh Pak Plant 1 should be aware that the potential for contamination of the aquifer still exists.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For the Idaho Fresh Pak Plant 1 well, drinking water protection activities should focus on correcting any deficiencies outlined in the Sanitary Survey (an inspection conducted every five years with the purpose of determining the physical condition of a water system’s components and its capacity), including protection of the well from surface flooding. Also, disinfection practices should be implemented if microbial contamination

becomes a problem. No chemicals should be stored or applied within the 50-foot radius of the wellhead. Additionally, there should be a focus on the implementation of practices aimed at reducing the leaching of farm chemicals from agricultural land within the designated source water areas and awareness of the potential contaminant sources within the delineation zone. Since much of the designated protection areas are outside the direct jurisdiction of Idaho Fresh Pak Plant 1, collaboration and partnerships with state and local agencies, and industry groups should be established and are critical to the success of drinking water protection.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan as the delineation is near to urban and residential land uses. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the U.S. Environmental Protection Agency. As there is a transportation corridor through the delineation, the State Department of Transportation should be involved in protection activities. Drinking water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the local Soil Conservation District, and the Natural Resources Conservation Service.

A community must incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, specific best management practices). For assistance in developing protection strategies please contact the Idaho Falls Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR IDAHO FRESH PAK PLANT 1 – OFFICE AND PACKAGING, LEWISVILLE, IDAHO

Section 1. Introduction - Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the rankings of this assessment mean.** Maps showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are attached. The list of significant potential contaminant source categories and their rankings used to develop the assessment is also included.

Background

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area and sensitivity factors associated with the wells and aquifer characteristics.

Level of Accuracy and Purpose of the Assessment

Since there are over 2,900 public water sources in Idaho, there is limited time and resources to accomplish the assessments. All assessments must be completed by May of 2003. An in-depth, site-specific investigation of each significant potential source of contamination is not possible. **Therefore, this assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. The Idaho Department of Environmental Quality (DEQ) recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a drinking water protection program should be determined by the local community based on its own needs and limitations. Wellhead or drinking water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

The public drinking water system for Idaho Fresh Pak Plant 1 is comprised of one ground water well that serves approximately 135 people through two connections. The well is located in Jefferson County, along

Highway 48, slightly north of Lewisville and about a mile south of Menan (Figure 1).

There are no current significant potential water problems affecting the Idaho Fresh Pak Plant 1 well. Total coliform bacteria were detected in distribution in October 2000. The inorganic contaminants (IOCs) barium, chromium, fluoride and nitrate have been detected in the well water at levels below the current Maximum Contaminant Levels (MCLs). No volatile organic contaminants (VOCs) or synthetic organic contaminants (SOCs) have been detected in the well water. However, the delineation does cross areas of concern related to high ratings of “county level nitrogen fertilizer use”, “county level herbicide use”, and “total county level Ag-chemical use”.

Defining the Zones of Contribution – Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time-of-travel (TOT) zones (zones indicating the number of years necessary for a particle of water to reach a well) for water in the aquifer. DEQ contracted with Washington Group, International (WGI) to perform the delineations using a refined computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) TOT for water associated with the Eastern Snake River Plain (ESRP) aquifer in the vicinity of the Idaho Fresh Pak Plant 1. The computer model used site specific data, assimilated by WGI from a variety of sources including the Idaho Fresh Pak Plant 1 operator input, local area well logs, and hydrogeologic reports (detailed below).

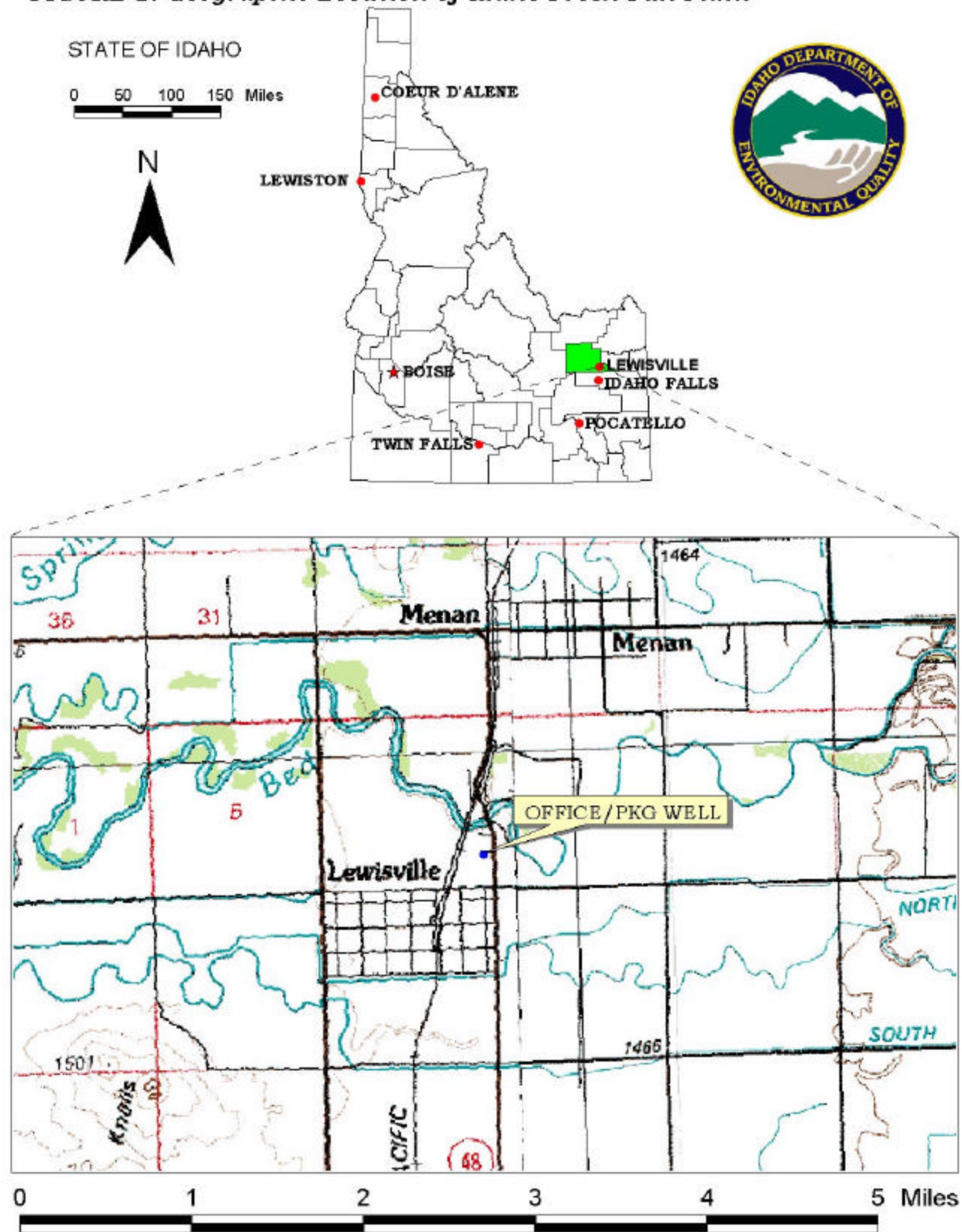
The ESRP is a northeast trending basin located in southeastern Idaho. Ten thousand square miles of the basin are primarily filled with highly fractured layered Quaternary basalt flows of the Snake River Group, which are intercalated with terrestrial and lacustrine (lake-deposited) sediments along the margins (Garabedian, 1992, p. 5). Individual basalt flows range from 10 to 50 feet in thickness and average 20 to 25 feet (Lindholm, 1996, p. 14). Basalt is thickest in the central part of the eastern plain and thins toward the margins. Whitehead (1992, p. 9) estimates the total thickness of the flows to be as great as 5,000 feet. A thin layer (0 to 100 feet) of windblown and fluvial sediments overlies the basalt.

The plain is bound on the northeast by rocks of the Yellowstone Group (mainly rhyolite) and Idavada Volcanics to the southwest. The Snake River flows along part of the southern boundary and is the only drainage that leaves the plain. Rivers and streams entering the plain from the south are tributary to the Snake River. Other than the Big and Little Wood rivers, rivers entering from the north vanish into the highly transmissive basalts of the Snake River Plain aquifer.

The layered basalts of the Snake River Group host one of the most productive aquifers in the United States. The aquifer is generally considered unconfined, yet it may be locally confined in some areas because of interbedded clay and dense unfractured basalt (Whitehead, 1992, p. 26). Whitehead (1992, p. 22) reports that well yields of 2,000 to 3,000 gal/min are common for wells open to less than 100 feet of the aquifer. Lindholm (1996, p. 18) estimates aquifer thickness to range from several hundred feet near the plain's margin to thousands of feet near the center.

The majority of aquifer recharge results from surface water irrigation activities (incidental recharge), which divert water from the Snake River and its tributaries (Ackerman, 1995, p. 4, and Garabedian, 1992, p. 11). Natural recharge occurs through stream losses, direct precipitation, and tributary basin underflow.

FIGURE 1. Geographic Location of Idaho Fresh Pak Plant



The Upper ESRP hydrologic province is located on the northeastern margin of the ESRP. The majority of the province is located above the confluence of the South and Henrys Forks of the Snake River in southwestern Madison County. The province occupies portions of Fremont, Madison, Jefferson, and Bonneville counties. The province covers 445 square miles, which is 4.3 percent of the ESRP's total area.

Published water table maps specific to the Upper ESRP regional aquifer are limited. The few area-specific maps that are available (e.g., Crosthwaite et al., 1967, p. 27, and Baker, 1991, p. 10) show similar patterns of flow to those depicted at the regional scale. Regional ground water flow is to the southwest paralleling the basin (Cosgrove et al., 1999, p. 21; deSonneville, 1972, p. 78; Garabedian, 1992, p. 48; and Lindholm, 1996, p. 23). Ground water flow direction at the local scale is thought to be highly variable due to preferential flow paths through the fractured and layered basalts.

The delineated source water assessment area for the Idaho Fresh Pak Plant 1 well can best be described as a pie-shaped corridor approximately six miles long extending to the east-northeast of the Idaho Fresh Pak Plant 1 wellhead and ending at the Snake River (Figure 2). The actual data used by WGI in determining the source water assessment delineation areas are available from DEQ upon request.

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and others, such as cryptosporidium, and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of groundwater contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

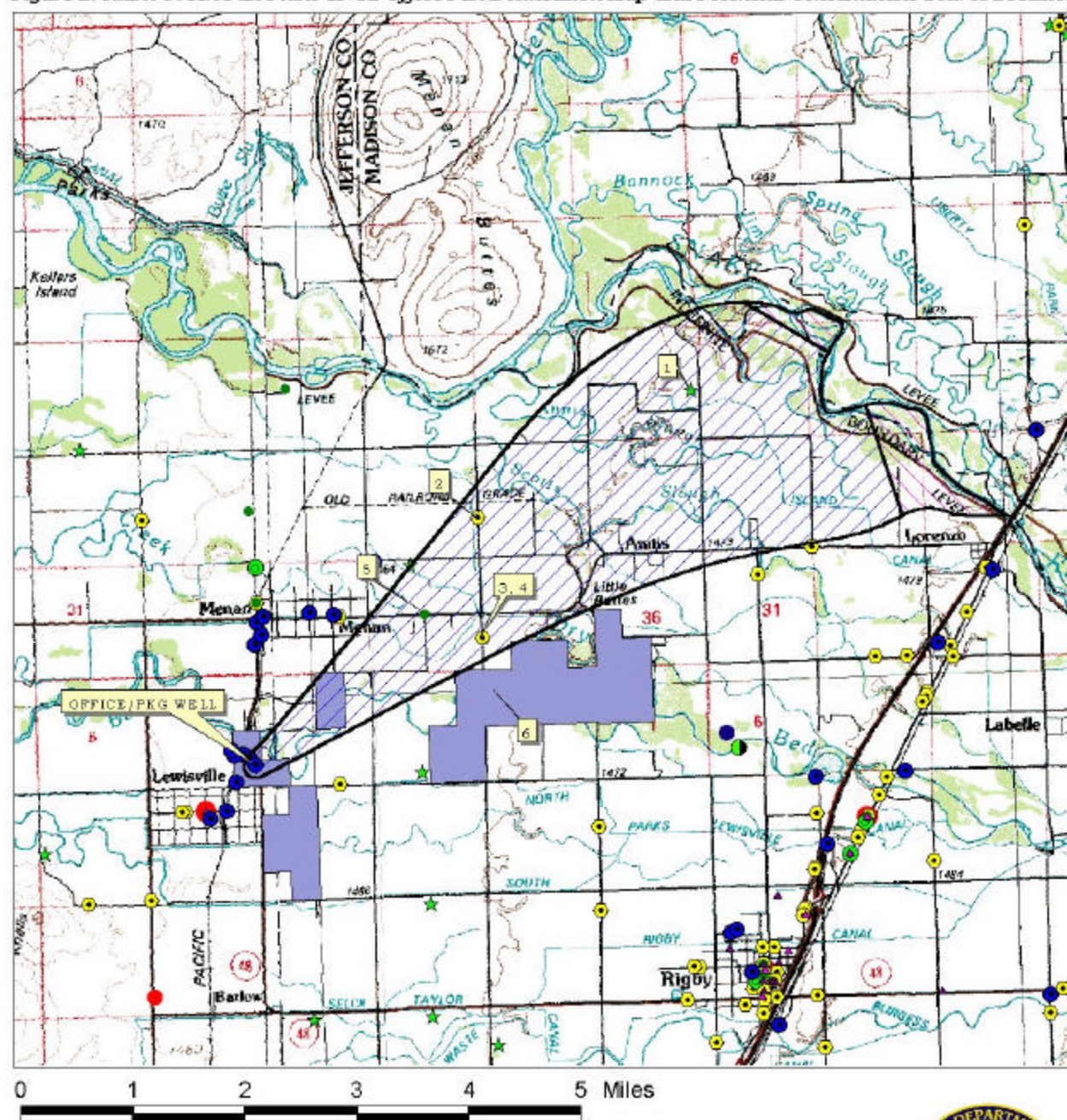
Land use within the immediate area of the Idaho Fresh Pak Plant 1 wellhead consists of irrigation and transportation uses, while the surrounding area is predominantly residential and irrigated agriculture.

It is important to understand that a release may never occur from a potential source of contamination provided they are using best management practices. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, including educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted in July through August 2001. The first phase involved identifying and documenting potential contaminant sources within the Idaho Fresh Pak Plant 1 Source Water Assessment Area (Figure 2) through the use of computer databases and Geographic Information System maps developed by DEQ.

Figure 2. Idaho Fresh Pak Plant 1P 12 Office Pak Delineation Map and Potential Contaminant Source Locations



PWS# 7260067
OFFICE/PKG WELL

The second, or enhanced, phase of the contaminant inventory involved contacting the operator to identify and add any additional potential sources in the area.

The delineated source water area encompasses a pie-shaped corridor of land between the well site and the Snake River. The delineation (Table 1, Figure 2) has nine potential contaminant sources, including a dairy, a livestock breeder site, two wastewater land application (WLAP) sites, two construction sites, and a site regulated by the Superfund Amendments and Reauthorization Act (SARA). In addition, the delineation crosses Highway 48 in the 3-year time of travel (TOT) and ends at the Snake River in the 6-year TOT.

Table 1. Idaho Fresh Pak Plant 1Well, Potential Contaminant Inventory

Site #	Source Description ¹	TOT ZONE ²	Source of Information	Potential Contaminants ³
1	Dairy ≤ 200 cows	0 – 3	Database Search	IOC, Microbes
2	Livestock Breeders	0 – 3	Database Search	IOC, Microbes
3	General Contractors	0 – 3	Database Search	IOC, VOC, SOC
4	General Contractors	0 – 3	Database Search	IOC, VOC, SOC
5	SARA	0 – 3	Database Search	VOC, SOC
6	WLAP	0 – 3	Database Search	IOC, VOC, SOC, Microbes
7	WLAP	0 – 3	Database Search	IOC, VOC, SOC, Microbes
	Highway 48	0 – 3	GIS Map	IOC, VOC, SOC, Microbes
	Snake River	3 – 6	GIS Map	IOC, VOC, SOC

¹ SARA = Superfund Amendments and Reauthorization Act, WLAP = wastewater land application

² TOT = time-of-travel (in years) for a potential contaminant to reach the wellhead

³ IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Section 3. Susceptibility Analyses

The water system's susceptibility to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. Each of these three categories carries the same weight in the final assessment, meaning that a low score in one category coupled with higher scores in the other categories can still lead to a overall susceptibility of high. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. Attachment A contains the susceptibility analysis worksheet for the system. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

The hydrologic sensitivity of a well is dependent upon four factors: the surface soil composition, the material in the vadose zone (between the land surface and the water table), the depth to first ground water, and the presence of a 50-foot thick fine-grained zone above the producing zone of the well. Slowly draining soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel. Similarly, fine-grained sediments in the subsurface and a water depth of more than 300 feet protect the ground water from contamination.

Hydrologic sensitivity rates moderate for the well (Table 2). The soils surrounding the area of the wellhead are in the poor to moderately-drained class, reducing the downward movement of contaminants. However, the well log indicates that the vadose zone is composed mostly of sand and gravel. It also shows a lack of sedimentary interbeds between basalt layers above the producing zone of the well. The depth to first ground water is shallow at 10 feet below ground surface (bgs).

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have better buffering capacity. If the wellhead and surface seal are maintained to standards, as outlined in Sanitary Surveys, then contamination down the well bore is less likely. If the well is protected from surface flooding and is outside the 100-year floodplain, then contamination from surface events is reduced.

The Idaho Fresh Pak Plant 1 well has a moderate system construction score. According to the well log, the well was drilled in 1992 to a depth of 40 feet and then deepened in 1994 to a depth of 220 feet. It was constructed using a 10-inch diameter casing at 0.250-inch thickness placed at a depth of 182 feet through a low permeable layer of red clay. According to the 1997 Sanitary Survey, the wellhead and surface seals are maintained to standards but the wellhead is not properly protected from surface runoff.

Though the well may have been in compliance with standards when it was completed, current public water system (PWS) well construction standards are more stringent. The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all PWSs to follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. These standards include provisions for well screens, pumping tests, and casing thicknesses to name a few. Table 1 of the *Recommended Standards for Water Works* (1997) lists the required steel casing thickness for various diameter wells. Ten-inch diameter wells require a casing thickness of at least 0.365-inches.

Potential Contaminant Source and Land Use

The Idaho Fresh Pak Plant 1 well rates high for IOCs (i.e. nitrates, arsenic), VOCs (i.e. petroleum products) and SOCs (i.e. pesticides) and moderate for microbial contaminants (i.e. bacteria). A dairy, the WLAPs and the local transportation corridor as well as the predominant agricultural land use in the delineated source area account for the largest contribution of points to the potential contaminant inventory rating.

The well is in a county with high nitrate fertilizer use, high levels of herbicide use, and high total ag-chemical use. Total coliform bacteria were detected in the distribution system of the well in October 2000. However, there have been no total coliform repeat detections in the well. The well has consistently shown nitrate (an IOC) at levels below 1.6 mg/L (the MCL is 10 mg/L). No VOCs or SOCs have been detected in the well water.

Final Susceptibility Ranking

A detection above a drinking water standard MCL or a detection of total coliform bacteria or fecal coliform bacteria at the wellhead will automatically give a high susceptibility rating to a well despite the land use of the area because a pathway for contamination already exists. Additionally, if there are contaminant sources located within 50 feet of the source then the wellhead will automatically get a high susceptibility rating. Hydrologic sensitivity and system construction scores are heavily weighted in the final scores. Having multiple potential contaminant sources in the 0- to 3-year time of travel zone (Zone 1B) and agricultural land contribute greatly to the overall ranking. In terms of total susceptibility, the well rates high for IOCs, SOC, and microbial contamination, and it rates moderate for VOCs.

Table 2. Summary of Idaho Fresh Pak Plant 1 Susceptibility Evaluation

Well	Susceptibility Scores ¹									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	Final Susceptibility Ranking			
		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
Well #1	M	H	H	H	M	M	H	M	H	H

¹H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility,

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Susceptibility Summary

Overall, the Idaho Fresh Pak Plant 1 well ranks high for IOCs, SOC, and microbial contaminants. It ranks moderate for VOCs. Sources located in the 3-year TOT that contain leachable chemicals such as the dairy, the transportation corridor, and the WLAPs contributed many points to the high rankings. The intense agricultural practices and the high county-wide use of agricultural chemicals also added points to the high susceptibility ratings. In determining the susceptibility rating for microbial contaminants, the source water assessment uses a higher multiplier when weighing hydrologic sensitivity and the system construction. This is due to the fact that microbial contaminants have a less overall point total than the other contaminant classes (IOCs, VOCs, SOC). Therefore, the heavily- weighed scores of hydrologic sensitivity and system construction contributed to the high score for microbial contaminants.

The most significant potential water problem currently affecting Idaho Fresh Pak Plant 1 well is that of bacterial contamination. Total coliform bacteria were detected in distribution in October 2000. There have been detections of the IOCs barium, chromium, fluoride and nitrate in the well water at levels below the current MCLs. No VOCs or SOC have been detected in the well water. The delineation crosses areas of concern related to high ratings of “county level nitrogen fertilizer use”, “county level herbicide use”, and “total county level Ag-chemical use”.

Section 4. Options for Drinking Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective drinking water protection program is tailored to the particular local drinking water protection area. A community with a fully developed drinking water protection program will incorporate many strategies. For the Idaho Fresh Pak Plant 1, drinking water protection activities should focus on correcting any deficiencies outlined in the Sanitary Survey (an inspection conducted every five years with the purpose of determining the physical condition of a water system’s components and its capacity), including protection of the well from surface flooding. Also, disinfection practices should be implemented if microbial contamination becomes a problem. No chemicals should be stored or applied within the 50-foot radius of the wellhead. Additionally, there should be a focus on the implementation of practices aimed at reducing the leaching of farm chemicals from agricultural land within the designated source water areas and awareness of the potential contaminant sources within the delineation zone. Since much of the designated protection areas are outside the direct jurisdiction of the Idaho Fresh Pak Plant 1, collaboration and partnerships with state and local agencies, and industry groups should be established and are critical to the success of drinking water protection.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan as the delineation is near to urban and residential land uses. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the U.S. Environmental Protection Agency. As there are transportation corridors through the delineation, the State Department of Transportation should be involved in protection activities. Drinking water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the local Soil Conservation District, and the Natural Resources Conservation Service.

A community must incorporate a variety of strategies in order to develop a comprehensive source water assessment protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, specific best management practices). For assistance in developing protection strategies please contact the Idaho Falls Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

Assistance

Public water supplies and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Idaho Falls Regional DEQ Office (208) 528-2650

State DEQ Office (208) 373-0502

Website: <http://www2.state.id.us/deq>

Water suppliers serving fewer than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with drinking water protection (formerly wellhead protection) strategies.

POTENTIAL CONTAMINANT INVENTORY

LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as ASuperfund® is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5 mg/L.

NPDES (National Pollutant Discharge Elimination System)

– Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

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Attachment A

Idaho Fresh Pak Plant 1 Office and Packaging Water System Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

- 0 - 5 Low Susceptibility
- 6 - 12 Moderate Susceptibility
- ≥ 13 High Susceptibility

Ground Water Susceptibility Report

Public Water System Name :

IDAHO FRESH PAK PLANT 1P 1 2 OFFICE PAK

Well# : OFFICE/PKG WELL

Public Water System Number 7260067

11/5/2001 12:16:25 PM

1. System Construction

SCORE

Drill Date	12/12/1994	
Driller Log Available	YES	
Sanitary Survey (if yes, indicate date of last survey)	NO	0
Well meets IDWR construction standards	NO	1
Wellhead and surface seal maintained	NO	1
Casing and annular seal extend to low permeability unit	YES	0
Highest production 100 feet below static water level	NO	1
Well located outside the 100 year flood plain	NO	1

Total System Construction Score 4

2. Hydrologic Sensitivity

Soils are poorly to moderately drained	YES	0
Vadose zone composed of gravel, fractured rock or unknown	YES	1
Depth to first water > 300 feet	NO	1
Aquitard present with > 50 feet cumulative thickness	NO	2

Total Hydrologic Score 4

3. Potential Contaminant / Land Use - ZONE 1A

IOC Score	VOC Score	SOC Score	Microbial Score
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Land Use Zone 1A	IRRIGATED CROPLAND	2	2	2	2
Farm chemical use high	YES	2	0	2	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		4	2	4	2

Potential Contaminant / Land Use - ZONE 1B

Contaminant sources present (Number of Sources)	YES	7	6	6	4
(Score = # Sources X 2) 8 Points Maximum		8	8	8	8
Sources of Class II or III leacheable contaminants or	YES	6	4	4	
4 Points Maximum		4	4	4	
Zone 1B contains or intercepts a Group 1 Area	YES	0	0	2	0
Land use Zone 1B Greater Than 50% Irrigated Agricultural Land		4	4	4	4

Total Potential Contaminant Source / Land Use Score - Zone 1B 16 16 18 12

Potential Contaminant / Land Use - ZONE II

Contaminant Sources Present	YES	2	2	2
Sources of Class II or III leacheable contaminants or	YES	1	1	1
Land Use Zone II 25 to 50% Irrigated Agricultural Land		1	1	1

Potential Contaminant Source / Land Use Score - Zone II 4 4 4 0

Potential Contaminant / Land Use - ZONE III

Contaminant Source Present	NO	0	0	0
Sources of Class II or III leacheable contaminants or	NO	0	0	0
Is there irrigated agricultural lands that occupy > 50% of	NO	0	0	0

Total Potential Contaminant Source / Land Use Score - Zone III	0	0	0	0
Cumulative Potential Contaminant / Land Use Score	24	22	26	14
4. Final Susceptibility Source Score	13	12	13	13
5. Final Well Ranking	High	Moderate	High	High